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EPAExecSec <EPAExecSec@epa.gov>  
FW: Concerns about Draft Rod for EMDF  
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**Subject:** Concerns about Draft Rod for EMDF

The Department of Energy (DOE) has provided an inadequate and deficient response to comments submitted by Advocates for the Oak Ridge Reservation (AFORR) and sister groups regarding the proposed construction and operation of the Environmental Management Disposal Facility (EMDF). DOE failed to follow the public participation requirements required for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup actions as outlined in federal law and regulations.

Also, DOE has repeatedly stymied the local community’s ability to receive, evaluate, and comment upon DOE’s preferred remedial action and its supporting data and analyses. CERCLA regulations specify that the public should be able to review and comment on remedial alternatives underpinned by “detailed analysis” generated and distributed prior to issuance of a proposed plan.

Instead, we citizens seem to be stuck with a project meant to handle hazardous waste that hasn’t even been defined, in a facility of which one cell will be built first as an experiment to see if the construction will hold up as expected. That’s a lot of issues to be determined.

The proposed project has many unknowns. The EMDF, with its many unknowns, is not a good fit for the Oak Ridge community or east Tennessee.

Thank you for considering these comments,

Virginia Dale, PhD Mathematical Ecology

Member of

Advocates for the Oak Ridge Reservation

Tennessee Citizens for Wilderness Planning

Sierra Club